

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. Nos. 25713, 25745, 29083 & 29428

**SUPPLEMENTAL CERTIFICATION OF COUNSEL REGARDING DEBTORS' ONE
HUNDRED FOURTEENTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN
OVERSTATED AND/OR UNLIQUIDATED PROOFS OF CLAIM
(CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. On September 25, 2024, the debtors and debtors-in-possession (the “Debtors”) filed the *Debtors’ One Hundred Fourteenth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)* [D.I. 25713, redacted & 25745, sealed] (the “Objection”).

2. On December 19, 2024, the Debtors filed a revised proposed form of order (the “Revised Order”), for the Objection under Certification of Counsel [D.I. 29083].

3. On January 29, 2025, Tyra Powell (“Powell”) filed a late response to the Objection [D.I. 29428] (the “Powell Response”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

4. Based on ongoing review, the FTX Recovery Trust has agreed to modify the Revised Order to resolve the Powell Response and the informal response from the holder of claim no. 13777.

5. The FTX Recovery Trust has further revised the Revised Order (the “Further Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the withdrawal of the Objection solely with regard to claim number 94947. A copy of the Further Revised Order compared against the Revised Order is attached hereto as **Exhibit B**. In accordance with the Court’s electronic order processing procedures, a clean copy of the Further Revised Order shall be uploaded to CM/ECF.

6. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Further Revised Order at its earliest convenience.

Dated: April 9, 2025
Wilmington, Delaware

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/s/ Matthew R. Pierce

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